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March 20, 2014

VIA ECF

Judge Pohorelsky
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Marinis v. Novartis Pharm. Corp.*, 1:06-cv-06162-JG-VVP

Judge Pohorelsky:

Following the status conference on March 6, 2014, the parties reached an agreement that eliminates the need for motion practice regarding the necessity of two additional fact witness non-party depositions. Specifically, the parties agreed to conduct the depositions of non-party witnesses, Meryl Soucie and Tracy Nadleman, only if it becomes evident during the deposition of Bill German that these individuals have information relevant to this action. Accordingly, defendant will not be filing a motion requesting any depositions today, March 20, 2014. All depositions will take place by May 31, 2014.

Respectfully submitted,

/s/ Eric Schwartz

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